

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

DEUTSCHE BANK TRUST COMPANY)	Civil Action No. 11-CV-00358
AMERICAS, in its capacity as successor)	
indenture trustee for certain series of)	JUDGE BECKWITH
Senior Notes, <i>et al.</i> ,)	MAGISTRATE JUDGE BOWMAN
)	
Plaintiffs,)	
v.)	
)	
AMERICAN ELECTRIC POWER, <i>et al.</i> ,)	
)	
Defendants.)	

**UNOPPOSED MOTION OF PROGRESSIVE CASUALTY INSURANCE
COMPANY FOR ENTRY OF AGREED ORDER EXTENDING TIME
UP TO AND INCLUDING NOVEMBER 28, 2011 TO ANSWER OR
OTHERWISE RESPOND TO PLAINTIFFS' COMPLAINT**

Plaintiffs Deutsche Bank Trust Company Americas, in its capacity as successor indenture trustee for certain series of Senior Notes, Law Debenture Trust Company of New York, in its capacity as successor indenture trustee for certain series of Senior Notes, and Wilmington Trust Company, in its capacity as successor indenture trustee for the PHONES Notes ("Plaintiffs"), and Defendant Progressive Casualty Insurance Company ("Progressive"), have agreed to extend the time within which Defendant Progressive may answer or otherwise respond to Plaintiffs' complaint until November 28, 2011, subject to any stay of proceedings that may otherwise be ordered by the Court. Accordingly, pursuant to Local Rule 7.3(a) and 7.4, Defendant Progressive hereby moves the Court to grant the requested extension per the parties' agreement.

Respectfully submitted,

/s/ Todd A. Atkinson

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CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2011, a copy of the foregoing
*Motion of Progressive Casualty Insurance Company for Entry of Agreed Order
Extending Time up to and including November 28, 2011 to Answer or Otherwise Respond
to Plaintiffs' Complaint* was filed electronically. Notice of this filing will be sent to all
parties by operation of the Court's Electronic Case Filing System. Parties may access
this filing through the Court's Electronic Case Filing System.

/s/ Todd A. Atkinson
*One of the Attorneys for Defendant
Progressive Casualty Insurance
Company*